

Date: 17 September 2024
Our ref: 483422
Your ref: Pre-Submission Surrey Heath Local Plan (2019-2038) – Regulation 19



Surrey Heath Borough Council

BY EMAIL ONLY

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Dear Sir / Madam,

Pre-Submission Surrey Heath Local Plan (2019-2038) – Regulation 19

Thank you for your consultation on the Pre-Submission Surrey Heath Local Plan (2019-2038) – Regulation 19 with the consultation period 7 August 2024 to 20 September 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Section 3: Housing

Policy HA1: Site Allocations

Natural England note that there are a number of additional sites proposed under Regulation 19 that were not included in the Regulation 18 consultation, particularly some of the smaller sites coming forward. **Natural England have some concerns with the deliverability of site HA1/18 - Land North of Guildford Road, Deepcut**, which is for 21 net units. From our mapping, this site allocation appears to be partly within the 400m Thames Basin Heaths Special Protection Area (SPA) exclusion zone, particularly Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI).

Natural England would advise against increased residential development within the 400m exclusion zone and care should be taken to ensure that all dwellings are kept wholly outside of this zone in the absence of an Appropriate Assessment particularly ruling out adverse impacts in this location. Natural England would recommend revisiting this site allocation to avoid encroaching into the exclusion zone.

Section 5: Infrastructure

Policy IN5: Green Infrastructure

Natural England welcome the inclusion of a dedicated green infrastructure policy, which also includes blue infrastructure too, and support this policy.

Section 6: Environment

Policy E1: Thames Basin Heaths Special Protection Area

Natural England welcome the inclusion of the Thames Basin Heaths Special Protection Area (SPA) policy. Natural England note that the associated Habitats Regulations Assessment (HRA) makes reference to the Strategic Access Management and Monitoring (SAMM) tariff changing each year in

line with inflation, we would welcome similar wording within the E1 policy itself.

Policy E2: Biodiversity and Geodiversity

Natural England welcome the inclusion of Policy E2. We are supportive of the Council's commitment to contribute towards Local Nature Recovery Strategy (LNRS) and that the Council will require mitigation if local, national or international sites will be impacted by development proposals. We welcome Policy E2 which outlines the hierarchy of designated sites potentially affected by the plan and the protection they are given.

Policy E3: Biodiversity Net Gain

Natural England support Surrey Heath's commitment to new development proposals providing a minimum of 20% biodiversity net gain across the borough and that this should be secured for a minimum of 30 years. We note that specific BNG targets should be achievable and evidence-based.

Natural England are pleased that the Council have made it clear that BNG is dealt with separately to mitigation/compensation requirements for European Sites, particularly in the case of new Suitable Alternative Natural Greenspace coming forward, which are required as part of Thames Basin Heaths SPA mitigation. Biodiversity net gain should be additional to any habitat creation/enhancement required to mitigate or compensate for impacts.

We welcome E3's commitment to the delivery of on-site net gain provision before delivery off-site, in line with the Biodiversity Gain Hierarchy. On-site provision can help to provide biodiversity gains close to where a loss may have taken place or is proposed and can increase access to nature for local communities.

Habitats Regulations Assessment

Natural England note that a Habitats Regulations Assessment (HRA) has been prepared by AECOM for Regulation 19 of the Surrey Heath Local Plan.

Recreational Disturbance

Natural England recognise the hard work and effort that the Council have put in to overcome the SANG deficit as identified in the Regulation 18 consultation. Surrey Heath Borough Council have worked in close collaboration with Natural England since the receipt of our comments on the Regulation 18 consultation and Natural England are grateful for their cooperation and determination to rectify the SANG deficit.

Natural England have previously signed off on a Statement of Common Ground (May 2024) with Surrey Heath Borough Council due to the advancements made in securing sufficient SANG capacity. Within this it stated that additional capacity would be sought from Diamond Ridge Woods, Shepherds Meadows and from various SANGs within Hart District Council. Natural England note that Shepherds Meadows SANG has not appear to be included in Table 5 under the new SANG options. Regardless of this, the provision of the new SANG at St Catherine's Road will ensure that there is sufficient capacity to cover this plan period and that this will also lead to a surplus of SANG going into the next plan period.

Natural England would like to seek clarification on whether C2 (extra-care or care home) development sites have been included in SANG capacity calculations. It is worth noting that Natural England would advise that if the development will be open to anyone who may be able to recreate on SPA sites, we would expect full mitigation contributions towards Suitable Alternative Natural Greenspace (SANG), and Strategic Access Management and Monitoring (SAMM). It would be assumed that residents are of a mobility level to visit the SPA particularly if residents are in self-contained accommodation and can therefore live reasonably independently, even if there is a level of care required. In these cases, avoidance and mitigation would be required. It's worth noting that partners living with individuals who have care needs might also be able to recreate on the SPA. Care homes that come forward within Surrey Heath Borough Council should provide sufficient evidence to demonstrate that residents are

unable to recreate on the SPA if they are not proposing mitigation contributions. Natural England recognise that even if C2 developments have not yet been factored into the SANG capacity, given that there will be a surplus of SANG coming forward in this Local Plan, this would likely cover the C2 site allocations.

Overall, Natural England support the conclusion that there will be no adverse effects on integrity of the Thames Basin Heaths Special Protection Area now that sufficient capacity has been identified. This is subject to the relevant SANG agreements with local neighbouring authorities, from which spare capacity has been agreed and that St Catherine's Road comes forward as a SANG.

Air Quality

Similarly to recreational disturbance, Natural England appreciate the effort taken by Surrey Heath Borough Council and AECOM to address our comments raised in response to Regulation 18. Natural England now agree with the conclusion that there will be no adverse effects on integrity of statutory designated sites due to air quality.

Yours Sincerely,

Paige Eke-Goodwin
Sustainable Development Higher Officer
Thames Solent Area Team